Google LLC
1600 Amphitheatre Parkway
Mountain View, CA 94043

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REDACTED FOR PUBLIC INSPECTION

March 7, 2019

Via Electronic Filing

Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street SW
Washington, DC 20554

Re: Performance Certification Results for a 3.5 GHz Environmental Sensing Capability Sensor Provided for Testing by Google LLC and CommScope, Inc. (GN Docket 15-319)

Dear Ms. Dortch:

Attached please find a cover letter and report presenting results of performance certification tests and observations performed in October 2018 on an Environmental Sensing Capability (ESC) sensor submitted by Google LLC and CommScope, Inc. of North Carolina.

Google requests confidential treatment of this report in order to protect its evolving business and technology strategies. The information Google seeks to keep confidential includes control, sensing, and communications information relating uniquely to its ESC capability. Because ESC services will be provided in a competitive environment, disclosure of this sensitive and proprietary information, which Google has not made publicly available, could result in substantial competitive harm to Google. Consistent with 47 C.F.R. § 0.459, Google requests notification if release of confidential information is requested pursuant to the Freedom of Information Act or otherwise.

Should you have any questions regarding this matter, please contact the undersigned.

Respectfully submitted,

Megan Anne Stull

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Counsel

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Re: Performance Certification Results for a 3.5 GHz Environmental Sensing Capability Sensor Provided for Testing by Google LLC and CommScope, Inc. (GN Docket 15-319)

Dear Ms. Dortch:

On February 28, 2019, the United States Department of Commerce, the Institute for Telecommunications Sciences (ITS), and the National Telecommunications and Information Administration issued the attached report presenting results of performance certification tests and observations performed in October 2018 on an Environmental Sensing Capability (ESC) sensor submitted by Google LLC and CommScope, Inc. of North Carolina.[1] The certification work was performed by ITS pursuant to a Cooperative Research and Development Agreement (CRADA) with Google and CommScope (CN-ITS-18-0009 and CN-ITS18-0010).[2]

Google submits this report in support of certification of their ESC for use in commercial deployment of 3.5 GHz spectrum sharing systems. As described by ITS, the ESC sensor "passed all certification tests and observations" without "problems or deficiencies . . . noted in any of the certification tests and observations" performed.[3]

Please let us know if you have any questions about this submission.

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[1] *See* Frank Sanders, et al., U.S. Dep't of Commerce, ITS, and Nat'l Telecomms. and Info. Admin., *Performance Certification Results for a 3.5 GHz Environmental Sensing Capability (ESC) Sensor Provided for Testing by Google LLC and CommScope, Inc.*, Final Report (Feb. 28, 2019).
[2] *Id.* at 4.
[3] *Id.* at 24.

Respectfully submitted,

Megan Anne Stull
Counsel

Andrew W. Clegg
Spectrum Engineering Lead
Google LLC

Performance Certification Results for a 3.5 GHz Environmental Sensing Capability (ESC) Sensor Provided for Testing by Google LLC and CommScope, Inc.

February 28, 2019
Final Report

Prepared by:

Frank Sanders, John Carroll, Geoffrey Sanders,
Rebecca Dorch, and Christopher Redding

[REDACTED]